

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JESSE L. MORGAN,

Plaintiff,

vs.

THE VOGLER LAW FIRM, P.C., et al.,

Defendants.

Case No. 4:15-cv-1654-SNLJ

AFFIDAVIT OF ATTORNEY BRYAN E. BRODY

The affiant, Bryan E. Brody, being of lawful age and being first duly sworn upon his oath, deposes and states as follows:

1. I am fully competent to provide the testimony contained herein. If called to do so, I will provide this testimony in Court.
2. I am the lead attorney of record for Plaintiff Jesse Morgan in the above-captioned case.
3. I graduated from the Tulane University Law School in 2005 and was licensed to practice law in the State of Missouri that same year.
4. I possess over a decade's worth of experience in consumer litigation, having represented both debtors and creditors in hundreds of cases. I have been the lead attorney in numerous successful appellate decisions involving consumer law before the Missouri Court of Appeals and the Supreme Court of Missouri.
5. Based on my experience providing counsel to debtors, they are an under-represented category of aggrieved consumers. Most consumers have little knowledge of their

rights and are unable to secure counsel to enforce those rights absent a statutory attorneys' fee provision, such as the rights provided by the Fair Debt Collection Practices Act and the Missouri Merchandising Practices Act.

6. I am familiar with the hourly fees charged by and awarded to attorneys in the Eastern District of Missouri and in the St. Louis region for litigation in general, and consumer rights litigation in particular.

7. I began representing Jesse Morgan on May 1, 2015 pursuant to an Attorney-Client Agreement.

8. My hourly rate of \$395.00 per hour is reasonable and consistent with, and in most cases less than, the rates of attorneys of comparable skill, reputation, and experience performing work in the St. Louis area.

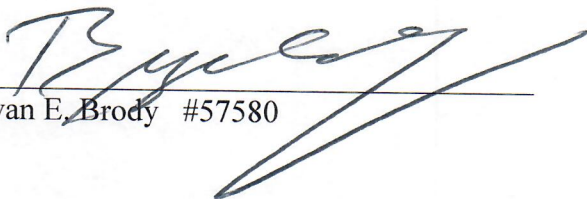
9. I am familiar with the hourly fees charged by and awarded to attorneys in the Eastern District of Missouri and in the St. Louis, Missouri region for federal litigation in general, and consumer rights litigation in particular. I have obtained this familiarity through conversations with colleagues, periodic reviews of fee surveys published by organizations such as the National Law Review, Missouri Lawyers Weekly, fee surveys particular to the practice of consumer law such as the United States Consumer Law Attorney Fee Survey Report, reading periodic reports of decisions where fees are awarded, and having my own fees accepted by my own clients for hourly work in consumer litigation and related fields.

10. This rate takes into account my ability to complete litigation tasks for consumer cases more efficiently than attorneys without my experience in this area of law.

11. Missouri state courts have approved and awarded fees at my rate of \$395.00 per hour, including on disputed fee motions.

12. The work I performed in this case is accurately reflected in Fee Invoice contemporaneously filed herewith. My firm prepared this Invoice using time entries that were recorded contemporaneously with the work performed.

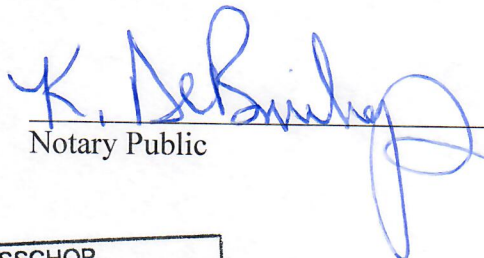
FURTHER AFFIANT SAYETH NOT.


Bryan E. Brody #57580

STATE OF MISSOURI
COUNTY OF ST. LOUIS

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Sworn to and subscribed before me this 15 day of June 2018.


Notary Public

My Commission Expires:

